



PUBLIC NOTICE

Federal Communications Commission
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COMMENT SOUGHT ON INTERCARRIER COMPENSATION REFORM COMPLIANCE AND MONITORING FORM

CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51; WC Docket Nos. 03-109, 05-337, 07-135, 10-90;
WT Docket No. 10-208

Comment Date: February 4, 2013
Reply Comment Date: February 19, 2013

On October 27, 2011, the Commission adopted a Report and Order and Further Notice of Proposed Rulemaking comprehensively reforming its Universal Service Fund (USF) and intercarrier compensation (ICC) systems.¹ As part of its reforms, the Commission adopted a recovery mechanism to facilitate incumbent local exchange carriers' (LECs) gradual transition away from intercarrier revenues reduced as part of the reforms adopted in the *USF/ICC Transformation Order*.² The *USF/ICC Transformation Order* requires incumbent LECs that participate in the intercarrier compensation recovery mechanism to file, on an annual basis, data regarding their "ICC rates, revenues, expenses, and demand."³

The Commission explained that such data are necessary to: (1) monitor compliance with the provisions of the Order and accompanying rules; (2) monitor the impact of the reforms adopted in the Order; (3) resolve outstanding issues raised in the Further Notice portion of the Order; (4) enable the Commission to evaluate the trend of intercarrier revenues, expenses, and minutes; and (5) compare such data uniformly across all carriers.⁴ The Commission delegated to the Wireline Competition Bureau "the authority to adopt a template for submitting the data . . ."⁵ By this Public Notice, we seek comment on using the proposed ICC Reform Compliance and Monitoring Form and the accompanying instructions available through the Internet link below as a means to collect the required data.

¹ See *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011), *pets. for review pending*, *Direct Commc'ns Cedar Valley, LLC v. FCC*, No. 11-9581 (10th Cir. filed Dec. 18, 2011) (and consolidated cases) (*USF/ICC Transformation Order*).

² *USF/ICC Transformation Order*, 26 FCC Rcd at 17956-18002, paras. 847-932.

³ *Id.* at 17996, paras. 921-23.

⁴ *Id.* at 17996, para. 922.

⁵ *Id.* at 17996, para. 923.

In the *USF/ICC Transformation Order*, the Commission required incumbent LECs to file ICC data from the preceding fiscal year “electronically annually at the same time as their annual interstate access tariff filings.”⁶ Though the 2012 annual access tariff filing has already taken place, we intend to collect Fiscal Year 2011 data. We will establish a deadline for submitting that data after we receive comment in response to this Public Notice and finalize the ICC Reform Compliance and Monitoring Form and instructions.⁷ In subsequent years, incumbent LECs must submit this information at the same time as they file their annual interstate access tariff filings, as required by the *USF/ICC Transformation Order*.⁸

I. ICC Reform Compliance and Monitoring Form Content and Instructions

The Internet link below labeled “Proposed ICC Reform Compliance and Monitoring Form” leads to a Microsoft Excel 2010 spreadsheet with multiple tabs which, if completed, would contain the data that we propose to collect from incumbent LECs participating in the recovery mechanism. A document containing instructions for completing this proposed ICC Reform Compliance and Monitoring Form is attached to this Public Notice as Attachment A. We seek comment on whether the proposed form and the accompanying instructions are sufficient to collect the data required to monitor compliance with the *USF/ICC Transformation Order*; to monitor its impact; to resolve outstanding issues raised in the Further Notice of Proposed Rulemaking portion of the *USF/ICC Transformation Order*; to evaluate intercarrier compensation trends; and to compare data across all carriers.⁹ We also seek comment as to whether the proposed form would collect data in a manner consistent with the *USF/ICC Transformation Order* and subsequent clarification Order.¹⁰

With respect to the confidentiality of data to be submitted,¹¹ we seek comment regarding whether the protections afforded in the Commission’s *Third Protective Order*¹² adopted in these proceedings are sufficient to protect any confidential data that may be provided. If not, what other measures are needed to satisfy this purpose and why? We also seek comment on the proposed instructions attached to this Public Notice as Attachment A. Are the proposed ICC Reform Compliance

⁶ *Id.* at 17996, para. 923.

⁷ We emphasize, however, that the information required for the ICC Reform Compliance and Monitoring Form is separate and apart from the materials required to support any proposed tariff revisions. Thus, carriers filing tariff revisions as part of any annual access charge tariff filing must still provide all information necessary to support proposed tariff revisions. See *Material to be Filed in Support of 2012 Annual Access Tariff Filings*, WCB/Pricing File No. 12-08, Order, 27 FCC Rcd 3960 (Wireline Comp. Bur. 2012).

⁸ *USF/ICC Transformation Order*, 26 FCC Rcd at 17996, para. 923.

⁹ *Id.* at 17996, para. 922.

¹⁰ See *id.* at 17996, para. 923; *Connect America Fund et al.*, WC Docket No. 10-90 et al., Order, 27 FCC Rcd 605, 611, para. 21 (2012).

¹¹ *USF/ICC Transformation Order*, 26 FCC Rcd at 17996, para. 921 (“All such information may be filed under protective order and will be treated as confidential.”).

¹² The Wireline Competition Bureau adopted a protective order to address the treatment of confidential filings in this rulemaking. *Connect America Fund et al.*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208, Protective Order, 26 FCC Rcd 10276, (Wireline Comp. Bur. rel. August 30, 2012) (*Third Protective Order*).

and Monitoring Form and accompanying instructions sufficiently clear so parties will know exactly what data to file? Are these instructions sufficient to ensure that filers report data in a uniform manner?

II. ICC Compliance Monitoring Form Format and Filing Procedures

We separately seek comment on the format and filing procedures we should adopt to collect the required data. Initially, we propose to use a Microsoft Excel 2010 spreadsheet with multiple tabs as the filing format. We believe that this format will gather data in a manner compatible with database software, including automated database applications. We seek comment on whether we should adopt a format that is compatible with database software, including automated database applications, and if so, whether the proposed form works for this purpose. Would a different format be more efficient or appropriate? The *USF/ICC Transformation Order* requires information to be filed annually and electronically.¹³ We envision requiring parties to file the proposed ICC Reform Compliance and Monitoring Form using the Commission's Electronic Tariff Filing System (ETFS). This process is comparable to the manner in which Annual Access Tariff Review Plans are submitted through the ETFS. Will submission of a Commission-provided spreadsheet, such as the proposed ICC reform compliance and monitoring form, within ETFS work as a method of filing the required data? If not, what would be a preferable electronic filing method?

III. Proposed Intercarrier Compensation Reform Compliance and Monitoring Form

The proposed ICC Reform Compliance and Monitoring Form is available at the following Internet address within the Commission Website:

http://transition.fcc.gov/wcb/ppd/ICC-Data/ICC_DATA_FORM_FOR_COMMENT_DA13-11.xls

IV. Procedural Information

Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated above. All pleadings are to reference **CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51; WC Docket Nos. 03-109, 05-337, 07-135, 10-90; WT Docket No. 10-208**. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).¹⁴ Two courtesy copies must be delivered to Gregory Haledjian, Federal Communications Commission, Wireline Competition Bureau, Pricing Policy Division, 445 12th Street, SW, Room 5-A333, Washington, DC 20554, or via e-mail at Gregory.Haledjian@fcc.gov.

- **Electronic Filers:** Comments may be filed electronically using the Internet by accessing the ECFS: <http://fjallfoss.fcc.gov/ecfs2/>.

- **Paper Filers:** Parties who choose to file by paper must file an original and one copy of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

¹³ *USF/ICC Transformation Order*, 26 FCC Rcd at 17996, para. 923.

¹⁴ See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (Voice), 202-418-0432 (TTY). This Public Notice establishes certain procedural requirements relating to consideration of the *USF/ICC Transformation Order*. This matter shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission's *ex parte* rules.¹⁵ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

For further information regarding this proceeding, contact Gregory Haledjian, Pricing Policy Division, Wireline Competition Bureau, (202) 418-1520, or via e-mail at Gregory.Haledjian@fcc.gov.

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¹⁵ 47 C.F.R. §§ 1.1200 *et seq.*

ATTACHMENT A

Intercarrier Compensation Reform Compliance and Monitoring Form Instructions

The Intercarrier Compensation Reform Compliance and Monitoring Form requires incumbent LECs to file certain interstate and intrastate data related to intercarrier compensation rates, revenues, expenses, and demand. For interstate data, reporting LECs must aggregate data for all of a holding company's LEC operations. For intrastate data, reporting LECs must aggregate data for each of a holding company's LEC state operations, and must also report totals as the sum for all states. The proposed Microsoft Excel form template is a multi-tab worksheet that has separate rows within the relevant tabs on which to report intrastate data for each of the 50 states, the District of Columbia, Guam, Puerto Rico, and American Samoa.

Reporting LECs must report:

- The number of lines and ports as of the end of the reporting period (September 30 of the prior reporting year), and the 12-month amount of minutes of use (MOU), messages, revenue, and expense for the reporting period
- Demand (*e.g.*, MOU) for services provided in the reporting year and for which revenue was collected by March 31 of the following year

Revenue for services provided in the reporting year and collected by March 31 of the following year.

- Expense for services received in the reporting year and paid for by March 31 of the following year.

Reporting LECs shall report all data in whole numbers, shall report dollar amounts without using dollar signs, and shall report all amounts using a comma to separate thousands (*e.g.*, report one million as 1,000,000).

All instructions shall be followed. All questions must be answered and all statements must be completed. If the proper answer is "none" or "not applicable," parties are required to insert that answer.

All data that requires clarification should be noted and fully explained.

TAB INSTRUCTIONS

Within each tab on the worksheet, each row, other than row 1, specifies a switched access or reciprocal compensation rate element, group of rate elements, or total for a group of rate elements for which demand, revenue, or expense data are reported. Row 1 contains the column heading.

Row number references below are to the row numbers on the specific Excel worksheet tab.

TAB "COVERPAGE"

<u>Row</u>	<u>Category Description</u>
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Basic Filing Information

- 2 Enter the name of the holding company for which the report is filed.
- 3 Enter the one-year reporting period from October 1 through September 30 using the following format: "10/01/YYYY - 09/30/YYYY," where YYYY identifies a year.
- 4 Enter the filing date using the following the format: "MM/DD/YYYY" to indicate the month, day, and year.
- 5 Contact Name.
- 6 Contact E-mail.
- 7 Contact Phone.
- 8 Enter Study Area Codes contained in the filing (enter one code in each column in this row; use as many columns as necessary).

TAB "ARC": Access Recovery Charge (ARC) Elements

- 2 Residential ARC– The interstate element for which a rate is assessed upon residential end users pursuant to section 51.915(e) of the Commission’s rules for price cap carriers, or section 51.917(e) for rate-of-return carriers.
- 3 Single-Line Business ARC – The interstate element for which a rate is assessed upon Single-Line Business (SLB) end users pursuant to section 51.915(e) of the Commission’s rules for price cap carriers, or section 51.917(e) for rate-of-return carriers.
- 4 Multi-Line Business ARC – The interstate element for which a rate is assessed upon Multi-Line Business (MLB) end users pursuant to section 51.915(e) of the Commission’s rules for price cap carriers, or section 51.917(e) for rate-of-return carriers.
- 5 Total ARC – The sum of rows 2 through 4.

TAB "CommonLine": Common Line Rate Elements

- 2 Primary Residential, SLB, and Lifeline end user common line – The interstate end user common line (EUCL) elements for which a rate is assessed upon primary residential and SLB end users pursuant to sections 69.104 for rate-of-return carriers and 69.152 for price cap carriers, and the element for which a carrier is reimbursed in whole or in part for providing lifeline service to an end user pursuant to section 54.407.
- 3 Nonprimary Residential and Basic Rate Interface Integrated Services Digital Network EUCL – The interstate element for which a rate is assessed upon nonprimary residential and basic rate interface (BRI) integrated services digital network (ISDN) end users pursuant to sections 69.104 for rate-of-return carriers and 69.152 for price cap carriers.

- 4 MLB, Primary Rate Interface ISDN, and Centrex EUCL – The interstate element for which a rate is assessed upon MLB, primary rate interface (PRI) ISDN, and Centrex end users pursuant to sections 69.104 for rate-of-return carriers and 69.152 for price cap carriers.
- 5 MLB and PRI ISDN Presubscribed Interexchange Carrier Charge – The interstate element for which a rate or presubscribed interexchange carrier charge (PICC) is assessed upon a MLB (excluding business Centrex) or PRI ISDN end user’s presubscribed interexchange carrier (IXC) pursuant to section 69.153.
- 6 Business Centrex PICC – The interstate element for which a rate is assessed upon a business Centrex end user’s presubscribed IXC pursuant to section 69.153.
- 7 Carrier Common Line Per MOU – The interstate common line elements for which per MOU rates are assessed upon IXCs pursuant to section 69.154.
- 8 Line Port Costs in Excess of Basic Analog Services – The interstate elements for which rates are assessed on end users pursuant to section 69.157.
- 9 Total Common Line – Interstate – The sum of rows 2 through 8.
- 10- Common Line – Intrastate – The intrastate functional equivalent of the common
62 line elements on rows 2 through 8. Each row is for a different state.
- 63 Total Common Line – Intrastate – The sum of rows 10 through 62.
- 64 Total Interstate and Intrastate Common Line – The sum of rows 9 and 63.

TAB “LocalSwitching”: Local Switching (including trunk ports and signaling for call setup) Rate Elements

- 2 Local Switching – Interstate – The interstate local switching elements for which rates are assessed pursuant to section 69.106.
- 3- Local Switching – Intrastate – The intrastate functional equivalent of the interstate
55 local switching elements. Each row is for a different state.
- 56 Total Local Switching – Intrastate – The sum of rows 3 through 55.
- 57 Total Interstate and Intrastate Local Switching – The sum of rows 2 and 56.

TAB: “TandemInfo”: Tandem-Switched Transport and Tandem Rate Elements

- 2 Tandem Switching (excluding common and dedicated multiplexers and dedicated trunk ports elements) – The interstate tandem switching element for which a rate is assessed pursuant to section 69.111(a)(2)(ii), excluding rates for tandem-related common and dedicated multiplexers and dedicated trunk ports if the carrier has separate rates for these multiplexers and ports.

- 3 Tandem-Switched Transport – Common (excluding common multiplexers elements) - The interstate elements for which a rate is assessed for common transport between the end office and the tandem switching office pursuant to 69.111(a)(2)(i).
- 4 Common Multiplexers – The interstate elements for which rates are assessed for common multiplexers used on the end office side of the tandem switch pursuant to section 69.111(l)(1), if the carrier has separate rates for these multiplexers.
- 5 Tandem-Switched Transport - Dedicated (excluding dedicated multiplexers and dedicated trunk ports elements) – The interstate elements for which rates are assessed for dedicated transport between the serving wire center and the tandem switching office pursuant to section 69.111(a)(2)(iii).
- 6 Dedicated Multiplexers – The interstate elements for which rates are assessed for dedicated multiplexers used on the serving wire center side of the tandem switch pursuant to sections 69.111(l)(2)(i) and 69.111(l)(2)(ii), if the carrier has separate rates for these multiplexers.
- 7 Dedicated Trunk Ports – The interstate elements for which rates are assessed for dedicated trunk ports on the serving wire center side of the tandem switch pursuant to section 69.111(l)(2)(i) and 69.111(l)(3), if the carrier has separate rates for these trunk ports.
- 8 Total Tandem-Switched Transport and Tandem – Interstate – The sum of rows 2 through 7.
- 9- Tandem-Switched Transport and Tandem – Intrastate – The intrastate functional
61 equivalent of the interstate tandem-switched transport and tandem elements on rows 2 through 7. Each row is for a different state.
- 62 Total Tandem-Switched Transport and Tandem – Intrastate – The sum of rows 9 through 61.
- 63 Total Interstate and Intrastate Tandem-Switched Transport and Tandem – The sum of rows 8 and 62.

TAB “SignalTandem”: Signaling for Tandem Switching Rate Elements

- 2 Signaling for Tandem Switching – Interstate – The interstate element for which a rate is assessed for signaling for tandem switching pursuant to section 69.129.
- 3- Signaling for Tandem Switching – Intrastate – The intrastate functional equivalent
55 of the interstate signaling for tandem switching element. Each row is for a different state.
- 56 Total Signaling for Tandem Switching – Intrastate – The sum of rows 3 through 55.
- 57 Total Interstate and Intrastate Signaling for Tandem Switching – The sum of rows 2 and 56.

TAB “DrectTrnkTrans”: Direct-Trunked Transport Rate Elements

- 2 Direct-Trunked Transport – Interstate – The interstate elements for which rates are assessed for direct-trunked transport pursuant to section 69.112.

- 3- Direct-Trunked Transport – Intrastate – The intrastate functional equivalent of the
55 interstate direct-trunked transport elements. Each row is for a different state.
- 56 Total Direct-Trunked Transport - Intrastate – The sum of rows 3 through 55.
- 57 Total Interstate and Intrastate Direct-Trunked Transport – The sum of rows 2 and 56.

TAB “DedSigTrans”: **Dedicated Signaling Transport Rate Elements**

- 2 Dedicated Signaling Transport – Interstate – The interstate elements for which rates are assessed
for dedicated signaling transport pursuant to section 69.125.
- 3- Dedicated Signaling Transport - Intrastate – The intrastate functional equivalent
55 of the interstate dedicated signaling transport elements. Each row is for a different state.
- 56 Total Dedicated Signaling Transport – Intrastate – The sum of rows 3 through 55.
- 57 Total Interstate and Intrastate Dedicated Signaling Transport – The sum of rows 2 and 56.

TAB “EntFac”: **Entrance Facilities Rate Elements**

- 2 Entrance Facilities – Interstate – The interstate elements for which rates are assessed for entrance
facilities pursuant to section 69.110.
- 3- Entrance Facilities – Intrastate – The intrastate functional equivalent of the
55 interstate entrance facilities elements. Each row is for a different state.
- 56 Total Entrance Facilities – Intrastate – The sum of rows 3 through 55.
- 57 Total Interstate and Intrastate Entrance Facilities – The sum of rows 2 and 56.

TAB “ILECCMRSRecip”: **Incumbent LEC-CMRS Reciprocal Compensation Rate Elements**

- 2- Incumbent LEC-CMRS Reciprocal Compensation – The elements for which rates
54 are assessed for the transport and termination of telecommunications traffic between an
Incumbent LEC and a Commercial Mobile Radio Service (CMRS) provider pursuant to section
51.701. Each row is for a different state.
- 55 Total Incumbent LEC-CMRS Reciprocal Compensation – The sum of rows 2-54.

TAB “RecipCompOther”: **Reciprocal Compensation Elements Other Than Incumbent LEC-CMRS
Compensation Rate Elements**

- 2- Reciprocal Compensation Other Than Incumbent LEC-CMRS Compensation -

- 54 The elements for which rates are assessed for the transport and termination of telecommunications traffic between an Incumbent LEC and a provider other than a CMRS provider, pursuant to section 51.701. Each row is for a different state.
- 55 Total Reciprocal Compensation Other Than Incumbent LEC-CMRS Compensation – The sum of rows 2-54.

COLUMN INSTRUCTIONS

Each tab within the data collection spreadsheets contains the same 29 columns (A through AC). Each column on the spreadsheet specifies a demand, revenue, or expense category for which an amount is to be reported relative to each of the row categories, beginning with row 2, unless there is a “---” in a row and column cell, which indicates that nothing should be reported in that cell.

Column letter references are to the column letters on the Microsoft Excel worksheet.

Col. Category Description

- A Switched Access or Reciprocal Compensation Category – The switched access or reciprocal compensation (Recip. Comp.) category for which demand, revenue, or expense data are reported.
- B Type of Traffic (Interstate, Intrastate, or Recip. Comp.) or State – The type of traffic for which data are reported. Three types of traffic are identified on the spreadsheet: interstate, intrastate, and non-access reciprocal compensation as defined in 47 CFR § 51.701(e). For intrastate traffic reporting other than intrastate totals, use the appropriate rows to indicate amounts for states in which a holding company has LEC operations.
- C Requested Unit of Demand – Report demand volumes in the units specified on the spreadsheet.
- D Eligible ARC Lines – Report the maximum number of lines on which an ARC could be assessed pursuant to section 51.915(e) of the Commission’s rules for price cap carriers, or section 51.917(e) for rate-of-return carriers.
- E Total Units For Flat-Rated Elements – Report for flat-rated elements the total number of units sold. Report only units for which revenues have been collected. Flat-rated elements are sold per unit of capacity (*e.g.*, per line, or per port); the total bill for these elements does not vary with usage (*e.g.*, with MOU or the number of messages). Report as part of the total for this category the number of VoIP units and the number of 8YY units sold on a flat-rate basis. For interstate PRI ISDN service, report as the number of EUCLs the number of charges assessed pursuant to section 69.104(p)(1) for rate-of-return carriers, or 69.152(l)(2) for price cap carriers, and as the number of PICC lines the number of charges assessed pursuant to 69.153(d). For interstate business Centrex service, report as the number of PICC lines the number of charges assessed pursuant to section 69.153(e). For intrastate PRI ISDN and business Centrex services, report as the number of EUCLs and PICC or equivalent lines the number of charges assessed pursuant to state rules.
- F Total Originating Units for Usage-Based Elements – Report for usage-based elements the total number of originating units sold. Report only units for which revenues have been collected.

Usage-based elements are sold per amount of use, (*e.g.*, per MOU or per message); the total bill for these elements varies with the amount of use (*e.g.*, with MOU or the number of messages). Report as part of this category the number of originating VoIP units and the number of originating 8YY units sold on a usage-rate basis.

- G Total Terminating Units for Usage-Based Elements – Report for usage-based elements the total number of terminating units sold. Report only units for which revenues have been collected. Report as part of this category the number of terminating VoIP units sold on a usage-rate basis.
- H VoIP Units for Flat-Rated Elements – Report for flat-rated elements the total number of VOIP units sold. Report only units for which revenues have been collected.
- I VoIP Originating Units for Usage-Based Elements – Report for usage-based elements the total number of VoIP originating units sold. Report only units for which revenues have been collected.
- J VoIP Terminating Units for Usage-Based Elements – Report for usage-based elements the total number of VoIP terminating units sold. Report only units for which revenues have been collected.
- K 8YY Units for Flat-Rated Elements – Report for flat-rated elements the total number of 8YY units sold. Report only units for which revenues have been collected.
- L 8YY Originating Units for Usage-Based Elements – Report for usage-based elements the total number of 8YY originating units sold. Report only units for which revenues have been collected.
- M Total Revenue From Flat Rates – Report for flat-rated elements the total amount of revenue collected. Report as part of the total amount for this category revenue derived from VoIP units and 8YY units sold on a flat-rate basis.
- N Total Revenue From Flat Rates Excluding Revenue From Affiliates – Report for flat-rated elements the total amount of revenue collected, excluding revenue from companies affiliated with the reporting Incumbent LEC. Report as part of the total amount for this category revenue derived from VoIP units and 8YY units sold on a flat-rate basis, excluding revenue from companies affiliated with the reporting Incumbent LEC.
- O Total Originating Revenue From Usage-Based Rates – Report for usage-based elements the total amount of revenue collected from the sale of originating units. Report as part of the total amount for this category revenue derived from originating VoIP units and originating 8YY units sold on a usage-rate basis.
- P Total Terminating Revenue From Usage-Based Rates Excluding Revenue From Affiliates – Report for usage-based elements the total amount of revenue collected from the sale of terminating units, excluding revenue from companies affiliated with the reporting Incumbent LEC. Report as part of the total amount for this category revenue derived from terminating VoIP units sold on a flat-rate basis, excluding revenue from companies affiliated with the reporting Incumbent LEC.
- Q Total Terminating Revenue From Usage-Based Rates – Report for usage-based elements the total amount of revenue collected from the sale of terminating units. Report as part of the total for this category revenue derived from terminating VoIP units sold on a usage-rate basis.

- R Total Terminating Revenue From Usage-Based Rates Excluding Revenue From Affiliates – Report for usage-based elements the total amount of revenue collected from the sale of terminating units, excluding revenue from companies affiliated with the reporting Incumbent LEC. Report as part of the total amount for this category revenue derived from terminating VoIP units sold on a flat-rate basis, excluding revenue from companies affiliated with the reporting Incumbent LEC.
- S VoIP Revenue From Flat Rates – Report for flat-rated elements the amount of VoIP revenue collected.
- T VoIP Originating Revenue From Usage-Based Rates – Report for usage-based elements the amount of VoIP revenue collected from the sale of originating units.
- U VoIP Terminating Revenue From Usage-Based Rates – Report for usage-based elements the amount of VoIP revenue collected from the sale of terminating units.
- V 8YY Revenue From Flat Rates – Report for flat-rated elements the amount of 8YY revenue collected.
- W 8YY Originating Revenue From Usage-Based Rates – Report for usage-based elements the amount of 8YY revenue collected from the sale of originating units.
- X Recip. Comp. Revenue-Related MOU – Report the MOU for which revenue has been collected.
- Y Recip. Comp. Revenue – Report the amount of revenue collected.
- Z Recip. Comp. Revenue Excluding Revenue From Affiliates – Report the amount of revenue collected excluding revenue from companies affiliated with the reporting Incumbent LEC.
- AA Recip. Comp. Expense-Related MOU – Report the MOU for which payment has been made.
- AB Recip. Comp. Expense – Report the amount of expense paid.
- AC Recip. Comp. Expense Excluding Expense Relating to Payments to Affiliates – Report the amount of expense paid excluding expense relating to payments to companies affiliated with the reporting Incumbent LEC.